

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
KATIE MILLIO, IRENE JOHNSON)	
JANINE HELLER and TOMAYITA)	
STEVENSON,)	
)	DOCKET NO. 04-CV-30130-MAP
Plaintiffs,)	
)	
v.)	
)	
ULTRASOUND DIAGNOSTIC SCHOOL)	
WHITMAN EDUCATION GROUP,)	
CAREER EDUCATION CORP.,)	
and LOUIS GIANNELLI,)	
)	
Defendants.)	
_____)	

PLAINTIFFS' MOTION TO COMPEL DISCOVERY AGAINST LOUIS GIANNELLI
AND REQUEST FOR HEARING

The plaintiffs hereby move to compel adequate responses to written discovery served upon the defendants in April, 2005. As grounds therefore, the plaintiffs submit their Memorandum in support of this motion, and state that Defendant Louis Gianelli failed to respond adequately to written requests for discovery as follows: Requests for the Production of Documents 24-30 and 43.

WHEREFORE, the plaintiffs request that this court:

1. Order the defendant to respond completely and fully to Document Requests 24-30, and 43 within ten days; and

2. Award the plaintiffs their reasonable attorney's fees and costs in prosecuting this motion.

CERTIFICATION PURSUANT TO LOCAL RULES 7.1(A)(2) and 37.1(B)

I certify that I have attempted in good faith to resolve or narrow the issues raised in this motion at a discovery conference, and have not been able to reach agreement on any discovery request noted in this Motion.

I hereby certify that a true copy of the above document was served upon the defendants' attorneys by mail (by hand) on

_____.

Dated: _____

THE PLAINTIFFS

By their attorneys,

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